

Re: Action Items For The FCC's  
Localism Task Force (Docket RM-10803)

Dear Commissioners and Localism Task Force members,

I am a US citizen who relies heavily on electronic media for information and entertainment. Also, I have worked as a technician and assistant engineer at full-power radio and TV stations.

I commend the FCC for creating a Task Force to investigate the issue of localism. My own comments pertain primarily to radio rather than television because I feel localism can most easily be restored in radio.

During its 80 years of existence, the amount of local content in radio broadcasting has steadily declined. In the early days of radio, hundreds of thousands of people invested a certain amount of effort in hearing radio stations from distant cities because their broadcasts were unique and contained elements of local culture. Local music, local politics, and locally produced entertainment shows filled the atmosphere.

Now, in many cases the only local element remaining in "local" radio is the commercials. The musical recordings, talk shows, and newscasts are created by distant corporations. In many cases even the DJ announcements between songs are recorded in distant cities.

The number of political and religious viewpoints that can be heard on the air is shockingly smaller than the number of viewpoints that exist in America. The consolidation of ownership has resulting in de facto censorship of local musicians, minority religions, and minority political views.

I urge the Task Force to make these recommendations to the full Commission:

#### TRANSLATOR REFORM

In my opinion the Task Force should urge the Commission to reform the FM translator service. A November 14 Petition For Rulemaking, filed by the Amherst Alliance and other parties, makes several important suggestions in this regard. Long distance translators should have "tertiary service status" and there should be numerical limits on ownership of translators.

## CREATION OF A LOW POWER AM BROADCAST SERVICE

A Petition For Rulemaking was filed by Fred Baumgartner, C.P.B.E. of Colorado, and placed in the Localism Task Force Docket through a filing on October 22. This Petition advocates the creation of a Low Power AM (LPAM) broadcast service.

While the Baumgartner petition provides us with a starting point, there are many specifics that need to be considered.

Limiting the new service to the 1610-1700 kHz portion of the AM band needlessly limits the number of stations that can be created. If I recall correctly, the 1610-1700 kHz expanded band was envisioned by the FCC as an area of minimal interference and the stations that invested in moving to this expanded band were promised a reduction in interference. Therefore one could reasonably argue that the new LPAM service should be established in the 540-1600 kHz portion of the AM band rather than the 1610-1700 kHz portion.

Regardless of what portion of the AM band is considered, these signals travel farther at night, so there are some genuine concerns about increased interference that might be caused by these low power stations. In order to simplify the interference calculations, and thereby make the licensing process more affordable both to applicants and the Commission, I believe one could reasonably argue that the new LPAM stations should only be authorized to operate from 6 AM to 6 PM local time. In this scenario the spacing of stations would be controlled by a simple algorithm and there would be no need to predict nighttime skywave interference. Some LPAM advocates will object to this idea on the basis that it would reduce their potential audience, but in reality a 30-watt or 100-watt LPAM signal would have very little range and audience at night due to interference from high-power distant stations. Operating such a low-power signal at night would be an exercise in futility except in the most densely populated areas.

Finally, there is no point in establishing a new service if it merely creates weaker clones of the existing types of broadcasters. The Commission should not be shy about requiring LPAM stations to broadcast a minimum amount of locally originated programming. The Commission should not hesitate to require the LPAM stations to give airtime to local political, religious, cultural and charitable

organizations. The Commission should feel no qualms about requiring LPAM stations to air material that is demonstrably different from what is available on full-power stations in their communities. Other nations place similar requirements on their low power broadcasters and the FCC must not fail to require low power stations to actually provide a voice for their communities.

Thank you for considering my comments.

sincerely,

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January 5, 2004